

EXHIBIT A

C. BRIAN KORBREK
(973) 577-1820 - DIRECT DIAL
(973) 577-1821 - DIRECT FAX
BKORBREK@GREENBAUMLAW.COM

January 14, 2019

COPY

Mario Barnabei, Esq.
Wheeler, DiUlio & Barnabei
1617 JFK Boulevard, Suite 1270
Philadelphia, PA 19103

Re: Sippel v. American Honda Motor Co., Inc.
Docket No. BUR-L-000129-18

Dear Mr. Barnabei:

Enclosed please find the following Authorization Forms for the release of Raymond Sippel's records:

1. Horizon Blue Cross Blue Shield of New Jersey
2. Worknet Occupational Medicine
3. Dr. Geoffrey E. Temple
4. Camden County Police Academy
5. City of Camden Police Department

Please have your client sign the enclosed authorizations and return same to me as soon as possible.

Very truly yours,

GREENBAUM, ROWE, SMITH & DAVIS LLP

C. BRIAN KORBREK

Enclosures

HIPAA AUTHORIZATION FORM

I hereby authorize use or disclosure of protected health information about Raymond Sippel described below.

1. The following specific person or class of person or facility is authorized to make the requested disclosure:

Horizon Blue Cross Blue Shield of New Jersey
Three Penn Plaza East
Newark, NJ 07105

2. The following person or class of person may receive disclosures of protected health information about Raymond Sippel:

Name: Greenbaum, Rowe, Smith & Davis LLP
Address: 75 Livingston Avenue
Roseland, NJ 07068

3. The specific information that should be disclosed is:

Complete copies of any and all documents related to the treatment or examination of Raymond Sippel, including, but not limited to the treatment or examination of Raymond Sippel and to permit the inspection of any tangible things related to the treatment and examination Raymond Sippel including protected health information.

4. The information disclosed will be used in connection with a personal injury lawsuit brought by Raymond Sippel.
5. I understand that the information used or disclosed may be subject to re-disclosure by the person or class of persons or facility receiving it, and would then no longer be protected by federal privacy regulations.
6. I may revoke this authorization by notifying in writing Greenbaum, Rowe, Smith & Davis LLP, the recipient of the information, of my desire to revoke it. However, I understand that any action already taken in reliance on this authorization cannot be reversed, and my revocation will not affect those actions. I understand that the medical provider to whom this authorization is furnished may not condition its treatment of me or whether or not I sign the authorization.
7. This authorization expires upon occurrence of the following event that relates to me or to the purpose of the intended use or disclosure of information about me: the filing of a stipulation of dismissal of the lawsuit captioned: Sippel v. American Honda Motor Co., Inc., Superior Court of New Jersey, Law Division, Camden County, Docket No. CAM-L-1898-17.

THIS FORM MUST BE FULLY COMPLETED BEFORE SIGNING:

Signature of Raymond Sippel

Date of Birth

Social Security No.

HIPAA AUTHORIZATION FORM

I hereby authorize use or disclosure of protected health information about Raymond Sippel described below.

1. The following specific person or class of person or facility is authorized to make the requested disclosure:

Worknet Occupational Medicine
9370 North Crescent Blvd.
Suite 200
Pennsauken, NJ 08110

2. The following person or class of person may receive disclosures of protected health information about Raymond Sippel:

Name: Greenbaum, Rowe, Smith & Davis LLP
Address: 75 Livingston Avenue
Roseland, NJ 07068

3. The specific information that should be disclosed is:

Complete copies of any and all documents related to the treatment or examination of Raymond Sippel, including, but not limited to the treatment or examination of Raymond Sippel and to permit the inspection of any tangible things related to your treatment and examination Raymond Sippel including protected health information.

4. The information disclosed will be used in connection with a personal injury lawsuit brought by Raymond Sippel.
5. I understand that the information used or disclosed may be subject to re-disclosure by the person or class of persons or facility receiving it, and would then no longer be protected by federal privacy regulations.
6. I may revoke this authorization by notifying in writing Greenbaum, Rowe, Smith & Davis LLP, the recipient of the information, of my desire to revoke it. However, I understand that any action already taken in reliance on this authorization cannot be reversed, and my revocation will not affect those actions. I understand that the medical provider to whom this authorization is furnished may not condition its treatment of me or whether or not I sign the authorization.
7. This authorization expires upon occurrence of the following event that relates to me or to the purpose of the intended use or disclosure of information about me: the filing of a stipulation of dismissal of the lawsuit captioned: Sippel v. American Honda Motor Co., Inc., Superior Court of New Jersey, Law Division, Camden County, Docket No. CAM-L-1898-17.

THIS FORM MUST BE FULLY COMPLETED BEFORE SIGNING:

Signature of Raymond Sippel

Date of Birth

Social Security No.

HIPAA AUTHORIZATION FORM

I hereby authorize use or disclosure of protected health information about Raymond Sippel described below.

1. The following specific person or class of person or facility is authorized to make the requested disclosure:

Dr. Geoffrey W. Temple
Geoffrey W. Temple Family Medical Assoc.
2835 Tyson Avenue
Philadelphia, PA 19149

2. The following person or class of person may receive disclosures of protected health information about Raymond Sippel:

Name: Greenbaum, Rowe, Smith & Davis LLP
Address: 75 Livingston Avenue
Roseland, NJ 07068

3. The specific information that should be disclosed is:

Complete copies of any and all documents related to the treatment or examination of Raymond Sippel, including, but not limited to the treatment or examination of Raymond Sippel and to permit the inspection of any tangible things related to your treatment and examination Raymond Sippel including protected health information.

4. The information disclosed will be used in connection with a personal injury lawsuit brought by Raymond Sippel.
5. I understand that the information used or disclosed may be subject to re-disclosure by the person or class of persons or facility receiving it, and would then no longer be protected by federal privacy regulations.
6. I may revoke this authorization by notifying in writing Greenbaum, Rowe, Smith & Davis LLP, the recipient of the information, of my desire to revoke it. However, I understand that any action already taken in reliance on this authorization cannot be reversed, and my revocation will not affect those actions. I understand that the medical provider to whom this authorization is furnished may not condition its treatment of me or whether or not I sign the authorization.
7. This authorization expires upon occurrence of the following event that relates to me or to the purpose of the intended use or disclosure of information about me: the filing of a stipulation of dismissal of the lawsuit captioned: Sippel v. American Honda Motor Co., Inc., Superior Court of New Jersey, Law Division, Camden County, Docket No. CAM-L-1898-17.

THIS FORM MUST BE FULLY COMPLETED BEFORE SIGNING:

Signature of Raymond Sippel

Date of Birth

Social Security No.

EMPLOYMENT RECORDS AUTHORIZATION FORM

I hereby authorize use or disclosure of protected employment information about Raymond Sippel described below.

1. The following specific person or class of person or facility is authorized to make the requested disclosure:

Camden County Police Academy
420 Woodbury – Turnersville Rd.
Blackwood, NJ 08012

2. The following person or class of person may receive disclosures of employment information about Raymond Sippel:

Name: Greenbaum, Rowe, Smith & Davis LLP
Address: 75 Livingston Avenue, Suite 301
Roseland, NJ 07068

3. The specific information that should be disclosed is:

A full and complete copy of any and all personnel files, payroll records, commission reports, bonus records, employment records, employment contracts, employment applications, academic records, written evaluations, progress reports, medical records, records, reports and/or notes concerning disciplinary actions, correspondence pertaining to Raymond Sippel, Social Security No.: 210-70-3769.

4. The information disclosed will be used in connection with a personal injury lawsuit brought by Raymond Sippel.
5. I understand that the information used or disclosed may be subject to re-disclosure by the person or class of persons or facility receiving it, and would then no longer be protected by federal privacy regulations.
6. I may revoke this authorization by notifying in writing Greenbaum, Rowe, Smith & Davis LLP, the recipient of the information, of my desire to revoke it. However, I understand that any action already taken in reliance on this authorization cannot be reversed, and my revocation will not affect those actions.
7. This authorization expires upon occurrence of the following event that relates to me or to the purpose of the intended use or disclosure of information about me: the filing of a stipulation of dismissal of the lawsuit captioned: Sippel v. American Honda Motor Co., Inc., et al., United States District Court for the District of New Jersey, Civil Action No. 1:18-cv-09662.

THIS FORM MUST BE FULLY COMPLETED BEFORE SIGNING:

Signature of Raymond Sippel

Date

Date of Birth

Social Security Number

EMPLOYMENT RECORDS AUTHORIZATION FORM

I hereby authorize use or disclosure of protected employment information about Raymond Sippel described below.

1. The following specific person or class of person or facility is authorized to make the requested disclosure:

City of Camden Police Department
800 Federal Street
Camden, NJ 08103

2. The following person or class of person may receive disclosures of employment information about Raymond Sippel:

Name: Greenbaum, Rowe, Smith & Davis LLP
Address: 75 Livingston Avenue, Suite 301
Roseland, NJ 07068

3. The specific information that should be disclosed is:

A full and complete copy of any and all personnel files, payroll records, commission reports, bonus records, employment records, employment contracts, employment applications, written evaluations, progress reports, records, reports and/or notes concerning disciplinary actions, correspondence pertaining to Raymond Sippel, Social Security No.: 210-70-3769.

4. The information disclosed will be used in connection with a personal injury lawsuit brought by Raymond Sippel.
5. I understand that the information used or disclosed may be subject to re-disclosure by the person or class of persons or facility receiving it, and would then no longer be protected by federal privacy regulations.
6. I may revoke this authorization by notifying in writing Greenbaum, Rowe, Smith & Davis LLP, the recipient of the information, of my desire to revoke it. However, I understand that any action already taken in reliance on this authorization cannot be reversed, and my revocation will not affect those actions.
7. This authorization expires upon occurrence of the following event that relates to me or to the purpose of the intended use or disclosure of information about me: the filing of a stipulation of dismissal of the lawsuit captioned: Sippel v. American Honda Motor Co., Inc., et al., United States District Court for the District of New Jersey, Civil Action No. 1:18-cv-09662.

THIS FORM MUST BE FULLY COMPLETED BEFORE SIGNING:

Signature of Raymond Sippel

Date

Date of Birth

Social Security Number

EXHIBIT B

Greenbaum Rowe
Smith & Davis LLP

COUNSELORS AT LAW

75 LIVINGSTON AVENUE

SUITE 301

ROSELAND, NJ 07068-3701

(973) 535-1600 FAX (973) 535-1698

INFO@GREENBAUMLAW.COM

WWW.GREENBAUMLAW.COM

C. BRIAN KORBREK

(973) 577-1820 - DIRECT DIAL

(973) 577-1821 - DIRECT FAX

BKORBREK@GREENBAUMLAW.COM

WOODBIDGE OFFICE:
METRO CORPORATE CAMPUS ONE
P.O. BOX 5600
WOODBIDGE, NJ 07095-0988
(732) 549-5600
FAX (732) 549-1881

DELIVERY ADDRESS:
88 WOOD AVENUE SOUTH
ISELIN, NJ 08830-2712

NEW YORK OFFICE:
750 THIRD AVENUE
9TH FLOOR
NEW YORK, NY 10017
(212) 847-9858

February 19, 2019

VIA FACSIMILE

Mario Barnabei, Esq.

Wheeler, DiUlio & Barnabei

1617 JFK Boulevard, Suite 1270

Philadelphia, PA 19103

Re: Sippel v. American Honda Motor Co., Inc.
Docket No. BUR-L-000129-18

Dear Mr. Barnabei:

On January 14, we sent you the following authorization forms for the release of Raymond Sippel's records:

1. Horizon Blue Cross Blue Shield of New Jersey;
2. Worknet Occupational Medicine;
3. Dr. Geoffrey E. Temple;
4. Camden County Police Academy; and
5. City of Camden Police Department.

Please have your client sign the authorizations and return to me as soon as possible. Additional copies are enclosed.

Very truly yours,

GREENBAUM, ROWE, SMITH & DAVIS LLP


C. BRIAN KORBREK

CBK/mep

Enclosures

cc: Timothy J. Abeel, Jr., Esq. (w/encs.)(via facsimile)

Greenbaum Rowe
Smith & Davis LLP

COUNSELORS AT LAW

75 LIVINGSTON AVENUE

SUITE 301

ROSELAND, NJ 07068-3701

(973) 535-1600 FAX (973) 535-1698

INFO@GREENBAUMLAW.COM
WWW.GREENBAUMLAW.COM

C. BRIAN KORNBEK

(973) 577-1820 - DIRECT DIAL

(973) 577-1821 - DIRECT FAX

BKORNBEK@GREENBAUMLAW.COM

WOODBIDGE OFFICE:
METRO CORPORATE CAMPUS ONE
P.O. BOX 5600
WOODBIDGE, NJ 07095-0988
(732) 549-5600
FAX (732) 549-1981

DELIVERY ADDRESS:
99 WOOD AVENUE SOUTH
ISELIN, NJ 08830-2712

NEW YORK OFFICE:
750 THIRD AVENUE
9TH FLOOR
NEW YORK, NY 10017
(212) 847-9858

March 6, 2019

VIA FACSIMILE

Mario Barnabei, Esq.
Wheeler, DiUlio & Barnabei
1617 JFK Boulevard, Suite 1270
Philadelphia, PA 19103

Re: **Sippel v. American Honda Motor Co., Inc.**
Docket No. BUR-L-000129-18

Dear Mr. Barnabei:

As you know, on January 14, we provided plaintiff with several medical record authorizations for providers and/or employers identified in plaintiff's deposition. The authorizations relate to prior hearing tests performed on plaintiff. While clearly relevant, plaintiff had failed to identify these providers in his Rule 26 disclosures or in his responses to discovery. Defendant is entitled to these records.

In any event, please provide the authorizations by March 15, 2019, or we will be compelled to bring the issue to the Magistrate Judge.

If you have any questions concerning this matter, please let me know.

Very truly yours,

GREENBAUM, ROWE, SMITH & DAVIS LLP


C. BRIAN KORNBEK

CBK/mep

cc: Timothy J. Abeel, Jr., Esq. (via facsimile)

Brian KORNBREK

From: Brian KORNBREK
Sent: Thursday, March 28, 2019 2:23 PM
To: Mario Barnabei (mbarnabei@wdblegal.com)
Cc: Timothy Abeel (tim@timothyabeel.com)
Subject: Sippel

Mario:

I left you a message earlier in the week and another message just now. I believe that we should discuss this case. I have also sent several letters and e-mails.

First, there are a number of outstanding authorizations that have not been provided that were requested in January. You have never objected to the requests, so I do not understand what, if any, dispute we have here. I do not really want to bring this the attention of the Magistrate Judge, but at this point I'm not sure I have any choice. If we can reach an agreement on getting this done, I expect we can submit a consent order and it will not be a problem.

Second, I think now would be a good time to discuss the case generally. If we get too much further along, it may be too late. It may already be.

Please contact me to discuss. If not, I will file something next week.

Brian

EXHIBIT C

Brian KORBREK

From: Mario Barnabei <mbarnabei@wdblegal.com>
Sent: Monday, April 01, 2019 6:31 PM
To: Brian KORBREK; Timothy Abeel
Subject: RE: SIPPEL - Outstanding Discovery

Brian,

I cannot agree to the proposed order. It appears these issues must be raised with the judge. According to the Court's July 11, 2018 scheduling order, pre-trial factual discovery ended on December 21, 2018. The outstanding discovery requests were all served well outside of that date. If there were outstanding issues at the time of the fact discovery deadline, a motion to extend could have been sought before the close of discovery. Moreover, Plaintiff has already allowed Defendant an opportunity for the automobile to be inspected, which took place on April 3, 2018 and included a download of all relevant data.

Sincerely,
Mario

PLEASE NOTE MY EMAIL HAS CHANGED. PLEASE USE mbarnabei@wdblegal.com

Mario L. Barnabei, JD, MBA
Wheeler, DiUlio & Barnabei, P.C.
One Penn Center | Suite 1270
1617 JFK Boulevard
Philadelphia, PA 19103
tel: 215.568.2900 | fax: 215.568.2901
mbarnabei@wdblegal.com

CONFIDENTIALITY AND SETTLEMENT NOTICE

This e-mail message and any documents accompanying this e-mail transmission are communications from The Law Offices of Jonathan Wheeler, P.C. These are privileged and confidential attorney-client communications and/or work product of counsel. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution and/or the taking of or refraining from taking of any action in reliance on the contents of this email information is strictly prohibited and may result in legal action being instituted against you. Please reply to the sender advising of the error in transmission and delete the message and any accompanying documents from your system immediately.

IRS Circular 230 Notice: To ensure compliance with certain regulations promulgated by the U.S. Internal Revenue Service, we inform you that any federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, by any taxpayer for the purpose of (1) avoiding tax-related penalties under the U.S. Internal Revenue Code, or (2) promoting, marketing or recommending to another party any tax-related matters addressed herein, unless expressly stated otherwise.

In the event this email concerns settlement negotiations or discusses any settlement terms, please note that the discussed settlement is strictly between our client and the defendant. As such, our client cannot and does not consent to the settlement of the claims of any additional plaintiffs or third-parties and no additional plaintiffs or third-parties will be named as part of the settlement or allowed on any settlement checks without express consent and agreement by Plaintiff(s) prior to settlement. Thank you.

From: Brian KORBREK <BKORBREK@greenbaumlaw.com>
Sent: Monday, April 01, 2019 4:12 PM
To: Timothy Abeel <tim@timothyabeel.com>
Cc: Mario Barnabei <mbarnabei@wdblegal.com>
Subject: RE: SIPPEL - Outstanding Discovery

Thanks Tim. Mario?

From: Timothy Abeel [<mailto:tim@timothyabeel.com>]
Sent: Monday, April 01, 2019 4:07 PM
To: Brian KORBREK

Cc: Mario Barnabei (mbarnabei@wdblegal.com)

Subject: Re: SIPPEL - Outstanding Discovery

***** External Email Message *****

Agreed

Timothy J. Abeel, Jr., Esq.
Timothy Abeel & Associates, P.C.
25 Regency Plaza
Glen Mills, PA 19342
www.timothyabeel.com
888-830-1474
484-800-8432 (direct line)
484-840-8896 (Fax)

On Apr 1, 2019, at 3:40 PM, Brian KORNBERG <BKORNBREK@greenbaumlaw.com> wrote:

Gentlemen:

In order to attempt to avoid a dispute before the Magistrate Judge, I attach a proposed consent order. Please advise if we can resolve our issues with the submission of this order.

Brian

Disclaimer

This e-mail (including any attachments) is intended only for the exclusive use of the individual to whom it is addressed. The information contained hereinafter may be proprietary, confidential, privileged and exempt from disclosure under applicable law. If the reader of this e-mail is not the intended recipient or agent responsible for delivering the message to the intended recipient, the reader is hereby put on notice that any use, dissemination, distribution or copying of this communication is strictly prohibited. If the reader has received this communication in error, please immediately notify the sender by telephone (732-549-5600) or e-mail and delete all copies of this e-mail and any attachments. Thank you.

<SIPPEL - Consent Order.DOCX>

Disclaimer

This e-mail (including any attachments) is intended only for the exclusive use of the individual to whom it is addressed. The information contained hereinafter may be proprietary, confidential, privileged and exempt from disclosure under applicable law. If the reader of this e-mail is not the intended recipient or agent responsible for delivering the message to the intended recipient, the reader is hereby put on notice that any use, dissemination, distribution or copying of this communication is strictly prohibited. If the reader has received this communication in error, please immediately notify the sender by telephone (732-549-5600) or e-mail and delete all copies of this e-mail and any attachments. Thank you.

EXHIBIT D

Greenbaum Rowe
Smith & Davis LLP

COUNSELORS AT LAW

75 LIVINGSTON AVENUE

SUITE 301

ROSELAND, NJ 07068-3701

(973) 535-1600 FAX (973) 535-1698

INFO@GREENBAUMLAW.COM
WWW.GREENBAUMLAW.COM

WOODBIDGE OFFICE:
METRO CORPORATE CAMPUS ONE
P.O. BOX 5600
WOODBIDGE, NJ 07095-0988
(732) 549-5600
FAX (732) 549-1881

DELIVERY ADDRESS:
99 WOOD AVENUE SOUTH
ISELIN, NJ 08830-2712

NEW YORK OFFICE:
750 THIRD AVENUE
9TH FLOOR
NEW YORK, NY 10017
(212) 847-9858

C. BRIAN KORBREK
(973) 577-1820 - DIRECT DIAL
(973) 577-1821 - DIRECT FAX
BKORBREK@GREENBAUMLAW.COM

March 28, 2018

VIA FACSIMILE

Mario Barnabei, Esq.
Jonathan Wheeler, P.C.
One Penn Center, Suite 1270
Philadelphia, PA 19103

Re: Sippel v. American Honda Motor Co., Inc.
Docket No. BUR-L-000129-18

Dear Mr. Barnabei:

This letter will confirm that we have scheduled an inspection of the subject vehicle for 10:00 am on April 3, 2018, at Burns Honda. In addition to visual inspection and photographic documentation, we intend to download the data associated with the airbag deployment and any codes stored in the vehicle. We will provide plaintiff with the data collected.

This inspection is without prejudice to AHM's right to request additional inspections by experts AHM may retain in this case as it proceeds.

If you have any questions, please let me know.

Very truly yours,

GREENBAUM, ROWE, SMITH & DAVIS LLP


C. BRIAN KORBREK

CBK/mep
cc: Timothy J. Abeel, Jr., Esq. (via facsimile)

EXHIBIT E

Greenbaum Rowe
Smith & Davis LLP

COUNSELORS AT LAW

75 LIVINGSTON AVENUE

SUITE 301

ROSELAND, NJ 07068-3701

(973) 535-1600 FAX (973) 535-1698

INFO@GREENBAUMLAW.COM
WWW.GREENBAUMLAW.COM

C. BRIAN KORNBREK
(973) 577-1820 - DIRECT DIAL
(973) 577-1821 - DIRECT FAX
BKORNBREK@GREENBAUMLAW.COM

WOODBIDGE OFFICE:
METRO CORPORATE CAMPUS ONE
R.O. BOX 5800
WOODBIDGE, NJ 07095-0988
(732) 649-5800
FAX (732) 649-1881

DELIVERY ADDRESS:
89 WOOD AVENUE SOUTH
ISELIN, NJ 08830-2712

NEW YORK OFFICE:
750 THIRD AVENUE
8TH FLOOR
NEW YORK, NY 10017
(212) 847-9858

March 12, 2019

VIA FEDERAL EXPRESS

Mario Barnabei, Esq.
Wheeler, DiUlio & Barnabei
1617 JFK Boulevard, Suite 1270
Philadelphia, PA 19103

Re: **Sippel v. American Honda Motor Co., Inc.**
Case No. 18-9662 (NLH-AMD)

Dear Mr. Barnabei:

Defendant American Honda Motor Co., Inc., hereby amends its answers to interrogatories to include the enclosed records from AT&T (Bates stamped ATT 0001 – ATT 0052) that were produced in response to the Subpoena Duces Tecum issued by our office.

Based on our review of the records produced by AT&T, please provide the following information:

1. Please identify the person and/or business who was dialed at the telephone number (609) 408-6724 at 22:15:14 on January 31, 2017. See ATT 0012 Items 31 and 32.
2. Please provide the purpose and substance of the telephone call identified in item No. 1.
3. Please identify the person and/or business at the telephone number (732) 692-7327 from whom you received two text messages at 21:10:03 and 21:10:05 on January 31, 2017. See ATT 0043, Items 74 and 75.
4. Please provide the purpose and substance of the two text messages identified in item No. 3.

Greenbaum Rowe
Smith & Davis LLP

Mario Barnabei, Esq.

March 12, 2019

Page 2

5. Please identify the person and/or business at the telephone number 111130100 from whom you received two text messages at 21:15:49 on January 31, 2017. See ATT 0043, Items 76 and 77.
6. Please provide the purpose and substance of the two text messages identified in item No. 5.
7. Please identify the person and/or business at the telephone number (856) 625-1361 from whom you received two text messages at 21:15:49 on January 31, 2017. See ATT 0043, Items 78 and 79.
8. Please provide the purpose and substance of the two text messages identified in item No. 7.
9. Please identify the person and/or business at the telephone number (856) 437-9047 to whom you sent two text messages at 22:33:13 on January 31, 2017. See ATT 0043, Items 80 and 81.
10. Please provide the purpose and substance of the two text messages identified in item No. 9.

If you have any questions concerning this matter, please let me know.

Very truly yours,

GREENBAUM, ROWE, SMITH & DAVIS LLP



C. BRIAN KORBREK

CBK/mep

Enclosures

cc: Timothy J. Abeel, Jr., Esq. (w/encs.)(via Federal Express)